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Counsel for MICHAEL STICKLER

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

3:12-cr-00120-MMD-WGC

Plaintiff,

vs.

**DEFENDANT'S EMERGENCY
UNOPPOSED MOTION FOR
EXTENSION OF SELF SURRENDER
DATE TO BUREAU OF PRISONS**

MICHAEL STICKLER,

Defendant.

On February 9, 2015, Defendant Michael Stickler was sentenced to 30 months imprisonment (with a concurrent sentence) in two federal criminal cases.

At sentencing, the Court ordered the defendant to self-surrender to the Bureau of Prisons on Monday May 11, 2015.

On today's date, defense counsel learned that the Bureau of Prisons (BOP) has not yet designated Mr. Stickler to a federal facility to serve his sentence. Mr. Stickler is a diabetic and has high blood pressure. Counsel spoke with US Probation Officer Dan McCaw on today's date who confirmed this issue with the U.S. Marshal Service. Apparently, there is an issue with BOP regarding Mr. Stickler's medication.

1 Due to the fact that Mr. Stickler's self-surrender date is Monday May 11, 2015 and he had
2 not yet been designated, the defense respectfully requests a 30 day extension of the defendant's
3 self-surrender date. This extension is not for purposes of delay. The extension will give the BOP
4 sufficient time to designate the defendant to a federal facility to serve his federal sentence of
5 imprisonment.

6 The U.S. Attorney's Office does not oppose the defense request. AUSA Carla
7 Higginbotham advised the defense that she does not oppose the request. The defendant has also
8 been in compliance with his release conditions in this case.

9 The Defendant respectfully requests a 30 day extension of his current self-surrender date
10 of May 11, 2015.

11 Respectfully Submitted this 7th day of May, 2015.

12 SNELL & WILMER L.L.P.

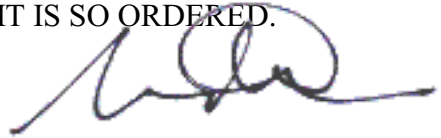
13
14 By: /s/ Craig S. Denney
15 Craig S. Denney
16 Nevada Bar No. 6953
17 50 W. Liberty Street, Suite 510
18 Reno, NV 89501

19 Attorneys for Defendant
20 *MICHAEL STICKLER*

21 Defendant is to surrender to the Bureau of Prisons by 12:00 PM on 6/11/2015.

22 IT IS SO ORDERED.

23
24 Dated: May 7, 2015

25 
26 U.S. District Judge

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **DEFENDANT'S EMERGENCY UNOPPOSED MOTION FOR EXTENSION OF SELF SURRENDER DATE TO BUREAU OF PRISONS** by method indicated below:

XXXXXX Electronic Filing (CM/ECF)

_____ U.S. Mail

_____ U.S. Certified Mail

_____ Facsimile Transmission

_____ Overnight Mail

_____ Federal Express

_____ Hand Delivery

and addressed to the following:

Carla Higginbotham
United States Attorney's Office
100 West Liberty, Suite 600
Reno, NV 89501
Carla.higginbotham@usdoj.gov
Attorneys for Plaintiff

DATED this 7th day of May, 2015.

/s/ Dawn Calhoun
An Employee of Snell & Wilmer L.L.P.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

3:12-cr-00120-MMD-WGC

Plaintiff,

**[PROPOSED] ORDER GRANTING
DEFENDANT'S EMERGENCY
UNOPPOSED MOTION FOR
EXTENSION OF SELF-SURRENDER
DATE TO BUREAU OF PRISONS**

vs.

MICHAEL STICKLER,

Defendant.

IT IS HEREBY ORDERED that Defendant's Emergency Unopposed Motion for Extension of Self-Surrender Date to Bureau of Prisons is granted. The Defendant shall self-surrender to the Bureau of Prisons on June __, 2015 before ____ PM.

IT IS SO ORDERED this ____ day of _____, 2015.

UNITED STATES DISTRICT JUDGE